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## UNITED STATES DISTRICT COURT

## DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	) Case No. Case 2:12-cr-00209-JCM -VC	F
Plaintiff,	) ) ) STIPULATION FOR	
MICHELLE HAEHNEL,	PROTECTIVE ORDER )	
Defendant.		

IT IS HEREBY STIPULATED AND AGREED between the undersigned attorneys, that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, drivers license numbers, dates of birth, or addresses, of victims in this case. Such documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

- 1. Protected Documents which will be used by the United States in its case in chief include personal identifiers, including social security numbers, drivers license numbers, dates of birth, and addresses, of the victims in this case. In addition, many of these documents may include personal identifiers that defendant may choose to use as evidence in this case.
- 2. The United States agrees to provide Protected Documents without redacting the personal identifiers of victims, with the possible exception of 302 reports, memoranda of interview and tax records that it reserves the right to produce in redacted form.
- 3. Access to Protected Documents by defendant will be restricted to personnel authorized by the Court, namely defendant, attorneys of record and attorneys, paralegals, investigators, experts,

and secretaries employed by the attorneys of record and performing services on behalf of defendant. As such, the following restrictions will be placed on defendant, defendant's attorney and the above-designated individuals unless and until further ordered by the Court. Defendant, defendant's attorney and the above-designated individuals shall not:

- a. make copies for, or allow copies of any kind to be made by any other person of Protected Documents, or allow the Protected Documents to be otherwise disseminated;
  - b. allow any other person to read Protected Documents; and
- c. use Protected Documents for any other purpose other than preparing to defend against the charges in the Indictment or any further superseding indictment arising out of this case.
- 4. Defendant shall not retain any copies of the Protected Documents. If defendant creates any notes that contain any personal identifiers received from the Protected Documents, then defendant's attorney shall retain such notes for defendant.
- 5. Defendant's attorney shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.
- 6. The requested restrictions shall not restrict the use or introduction as evidence of discovery documents containing personal identifying information such as social security numbers, drivers license numbers, dates of birth, and addresses during the trial of this matter.
- 7. Upon conclusion of this litigation, defendant's attorney shall return to counsel for the United States, or destroy and certify to counsel for the United States, the destruction of all

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1	discovery documents containing personal identifying information such as social security numbers,
2	drivers license numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty
3	days after defendant has exhausted all appellate rights or rights under 18 U.S.C. 2255.
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5	DANIEL BOGDEN
6	United States Attorney
7	Fol:
8	Assistant U.S. Attorney
9	Assistant 0.5. Allorney 4-25-13  Metalle Boulant 4-25-13
10	Matelle Carline 4-25-13
11	JONATHAN POWELL, Esq.  Counsel for defendant  DATE
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13	<u>ORDER</u>
14	IT IS SO ORDERED this day of May, 2013
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16	Contractor
17	UNITED STATES MAGISTRATE JUDGE
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